

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	CHAPTER 11
	§	
AGILON ENERGY HOLDINGS II LLC, et al.	§	CASE NO. 21-32156 (MI)
	§	
Debtors.¹	§	(Jointly Administered)

NOTICE OF APPEARANCE AND REQUEST FOR NOTICE

TO THE CLERK OF THE BANKRUPTCY COURT, DEBTOR, CERTAIN CREDITORS, AND THEIR ATTORNEYS OF RECORD, AND THE UNITED STATES TRUSTEE:

PLEASE TAKE NOTICE that the undersigned counsel hereby enters its appearance on behalf of NAES Corporation (“NAES”), a creditor in the above-referenced Chapter 11 bankruptcy cases (collectively, the “Bankruptcy Case”), pursuant to the United States Bankruptcy Code and Federal Rule of Bankruptcy Procedure 9010.

PLEASE TAKE FURTHER NOTICE that, pursuant to Federal Rules of Bankruptcy Procedure 2002, 3017, 9007, and 9010, the undersigned counsel hereby requests that all notices given or required to be given in the Bankruptcy Case including, but not limited to, all papers filed and served in all adversary proceedings in the Bankruptcy Case, and all notices mailed only to statutory committees or their authorized agents or to creditors and equity security holders who file with the court a request that all notices be mailed to them, be given to and served at the following address, email, telephone, and/or fax number:

¹ The debtors and debtors in possession these chapter 11 cases (the “Bankruptcy Case(s)”), along with the last four digits of their respective Employer Identification Numbers, are as follows: Agilon Energy Holdings II LLC (3389) (“Agilon”), Case No. 21-32156; Victoria Port Power LLC (4894) (“VPP”), Case No. 21-32157; and Victoria City Power LLC (4169) (“VCP” and together with Agilon and CPP, the “Debtors”), Case No. 21-32158. The Debtors’ mailing address is: 5850 San Felipe, Ste 601, Houston, Texas 77057.

Jameson J. Watts
jameson.watts@huschblackwell.com
HUSCH BLACKWELL LLP
111 Congress Avenue, Suite 1400
Austin, Texas 78701
(512) 479-1179
(512) 479-1101

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only notices and papers referred to in Federal Rule of Bankruptcy Procedure 2002, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint, or demand, disclosure statement or plan of reorganization, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, email, hand-delivery, telephone, fax transmission, or otherwise filed in or made with regard to this case and any proceeding commenced herein.

PLEASE TAKE FURTHER NOTICE that the foregoing simply constitutes a request for service of papers and does not constitute consent to the jurisdiction of the Bankruptcy Court or a waiver of the right to a jury trial. Further, this request for notice does not waive NAES's:

- a) Right to have any and all final orders for any and all non-core matters entered only after a *de novo* review by a United States District Court;
- b) Right to trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private rights, or in any case, controversy or proceeding related hereto, notwithstanding the designation of such matters as "core proceedings" pursuant to 28 U.S.C. § 157 and whether such jury trial right is pursuant to statute or the United States Constitution;
- c) Right to have the reference of any matter withdrawn by the United States District Court in any manner or proceeding subject to mandatory or discretionary withdrawal; and
- d) Other rights, claims, actions, setoffs, recoupments, or other matters to which NAES is entitled under any agreements or at law or in equity or under the United States Constitution.

All of the above rights are expressly reserved and preserved by NAES without exception and are not be waived, confessed, or conceded by filing this notice or by any other participation in this matter.

Dated: July 7, 2021

Respectfully Submitted,

HUSCH BLACKWELL LLP

By: /s/ Jameson J. Watts
Jameson J. Watts
Texas State Bar No. 24079552
S.D. Tex. No. 1314527
111 Congress Avenue, Suite 1400
Austin, Texas 78701
(512) 479-1179
(512) 479-1101 (fax)
jameson.watts@huschblackwell.com

COUNSEL FOR NAES CORPORATION

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing pleading is being served *via* this Court's ECF notification system to all parties registered to receive such notice on July 7, 2021.

/s/ Jameson J. Watts
Jameson J. Watts